

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-CR-20104-BECERRA**

**UNITED STATES OF AMERICA**

**v.**

**ARCANGEL PRETEL ORTIZ, et al.,**

**Defendants.**

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**UNITED STATES' SIXTEENTH RESPONSE  
TO THE STANDING DISCOVERY ORDER**

The United States hereby files this sixteenth response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16. Please note that the discovery is governed by a Protective Order (DE 26, 40, 164-171, 238). All pages are marked Restricted Material; certain pages are also marked 3500 Material, and such 3500 Material must be maintained by defense counsel and can only be viewed by the defendant in the presence of defense counsel (except as proposed by the government on April 4 and April 25, 2024). These productions supplement the discovery previously provided. *See* (DE 41, 52, 78, 92, 173, 174, 324, 326, 327, 425, 591, 667, 777, 812, and 985).

On April 25, 2025, the government produced Bates No. USA000420831 to USA000424151<sup>1</sup> to the Coordinating Discovery Attorney ("CDA") via USAfx. These materials consist of various law enforcement interview reports, agent notes, and other miscellaneous items

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<sup>1</sup> Within this Bates range, USA000420963 to USA0000420967, USA000423653 to USA000423668, USA000423680 to USA0000423690, and USA000423907 to USA0000423909, were previously produced as part of Production 18 and are excluded from the current production. In addition, approximately 60 documents have been excluded from this production as duplicates or near-duplicates of other documents.

and represent early production of potential Jencks and *Giglio* material. These reports detail certain statements of third-party witnesses and co-conspirators regarding the events at issue in this matter. To the extent there are differences between those statements and the government's view of the evidence, and in an abundance of caution, those statements are also being provided pursuant to *Brady* and its progeny.

The government will continue to produce discoverable material as appropriate on a rolling basis. The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, *Brady*, *Giglio*, *Napue*, and the obligation to assure a fair trial.

Respectfully submitted,

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United States Attorney

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**Certificate of Service**

I hereby certify that on April 25, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and thereby served all counsel of record.

/s Sean T. McLaughlin  
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Assistant United States Attorney